

MANAGEMENT ASSESSMENT REPORT

Management Assessment Number	Management Assessment Title	Assessment Date(s)
HEP-FY08-MA-001	Accumulation Area Waste Disposal	December 20, 2007
Organization	Assessed Program / Activity	Responsible Manager
High Energy Physics Division (HEP)	HEP Division accumulation area waste disposal practices for compliance with ANL Waste Handling Requirements	H. Weerts
Team Leader	Team Member(s)	ESH/QA Representative
L. Reed	W. Haberichter K. Wood	L. Reed

Executive Summary

The assessment was completed December 20, 2007 in partial fulfillment of Argonne National Laboratory procedures according to standards outlined in the Code of Federal Regulations, 40 CFR parts 262 and 265, the Illinois Administrative Code parts 722 and 725, and the High Energy Physics Division due diligence to proactively review operations for compliance with the Laboratory Waste Handling Procedures prescribed in the ANL ES&H manual, chapter 1, section 1.2 and 10.6 waste management.

High Energy Physics Division is owner of three RCRA hazardous waste accumulation areas which, include two Satellite Accumulation Areas, and one General Accumulation Area;

- 1) ID # 36200018 (SAA), Building 362, E-116, established 07/18/2007, Custodian 12928, W. Haberichter @ hep.anl.gov
- 2) ID # 36600001 (SAA), Building 366 annex, established 07/18/2007, Custodian 40372, K. Wood @ hep.anl.gov
- 3) ID # 36600002 (GAA), Building 366, established 07/18/2007, Custodian 40372, K. Wood @ hep. anl.gov

Waste accumulation areas, ID # 36200018, ID # 36600001, and ID # 36600002 did not meet the performance criteria for labeling containers to identify contents, nor did ID # 36600002 show an inventory of the waste placed inside. ANL ES&H manual, chapter 1.2, Sections 3.14 indicate (containers must be labeled "hazardous waste" or with other words that identify the content of the container), and 3.1.5 (an inventory must be kept of what's placed in each container).

The assessment confirmed the accumulation area housekeeping and storage concerns are consistent with ANL waste handling standards, and that accumulation areas were clear of debris and located in close proximity to waste being generated.

The assessment notes the following two issues; waste inventory, and container labeling as improvement opportunities, and will be entered and tracked in iCatch.

Purpose

Evaluate the conditions of HEP Division waste accumulation areas and verify the implementation of the ANL waste handling procedures requirements.

Scope

Interviewed William Haberichter and Ken Wood, the accumulation area custodians, reviewed inventory waste log(s), and visually inspected the waste accumulation area site.

Assessment Details/Results

The Waste Handling Procedures Manual was reviewed, and the recommended checklist was used during the inspection of waste accumulation areas.

Container labeling, storage, records and housekeeping were the focus while physically inspecting the waste

accumulation areas.

All High Energy Physics Division waste accumulation areas are registered components in the Chemical Management System, CMS.

Since the establishment of the following accumulation areas:

ID # 36200018 (SAA), a five-gallon can equipped with step-on level to open the lid, showed no label that identify the contents of the container. Building 362, E-116, established in the CMS 07/18/2007.

ID # 36600001 (SAA), 55-gallon drum including secondary containment stands alone without labeling identifying the contents of the container. Building 366, established in the CMS 07/18/2007.

ID # 36600002 (GAA), a five-gallon can equipped with step-on level to open the lid, showed no label that identify the contents of the container, and no inventory record of what was placed in the container. Building 366, established in the CMS 07/16/2007.

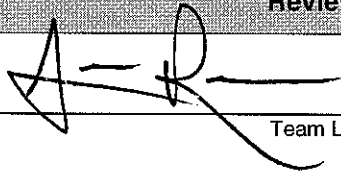
Additional Comments and/or Information

Waste Accumulation Area, ID # 36600001 existed prior to the date (07/18/2007) established in CMS, a logbook beginning 06/25/1997 indicated earlier activity, and a recent entry for one quart of vacuum pump oil, 07/27/2007.

List of Attachments

Reviews/Approvals

Performed by:



Team Leader

Date: 5/7/2008
mm/dd/yy

Reviewed by:

Date: _____
mm/dd/yy

Approved by:



Responsible Manager

Date: 5/8/08
mm/dd/yy

File/Distribution: Responsible Manager (retains original)
Next Level Manager
EQO Management Assessment Coordinator
ESH/QA Representative